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US DISTRICT COURT E.D.N.Y.

★ JUL 19 2019 ★

BROOKLYN OFFICE

MEG:NJM
F. #2018R02299

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

----- X

UNITED STATES OF AMERICA

- against -

TEHUTI AYEBOAFO,

Defendant.

----- X

THE GRAND JURY CHARGES:

I N D I C T M E N T

CR 19-337
Cr. No. **CR 19-337**
(T. 18, U.S.C., §§ 2 and 3551 et seq.;
T. 21, U.S.C., §§ 841(a)(1),
841(b)(1)(B)(iii), 841(b)(1)(C), 853(a)
and 853(p))

COGAN, J.

BULSARA, M.J.

DISTRIBUTION OF AND POSSESSION WITH INTENT TO
DISTRIBUTE COCAINE BASE, HEROIN AND FENTANYL

1. In or about and between November 2018 and March 2019, both dates being approximate and inclusive, within the Eastern District of New York, the defendant TEHUTI AYEBOAFO, together with others, did knowingly and intentionally distribute and possess with intent to distribute one or more controlled substances, which offense involved (1) 28 grams or more of a substance containing cocaine base, a Schedule II controlled substance, (2) a substance containing heroin, a Schedule I controlled substance, and (3) a substance containing fentanyl, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(iii) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

2. The United States hereby gives notice to the defendant that, upon his conviction of the offense charged herein, the government will seek forfeiture in accordance with Title 21, United States Code, Section 853(a), which requires any person convicted of such offense to forfeit: (a) any property constituting, or derived from, any proceeds obtained directly or indirectly as the result of such offense; and (b) any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offense.

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 21, United States Code, Sections 853(a) and 853(p))

A TRUE BILL



FOREPERSON

RICHARD P. DONOGHUE
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

BY: 
ACTING UNITED STATES ATTORNEY
PURSUANT TO 28 C.F.R. O.136

F.#: 2018R02299
FORM DBD-34
JUN. 85

No. _____

UNITED STATES DISTRICT COURT

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

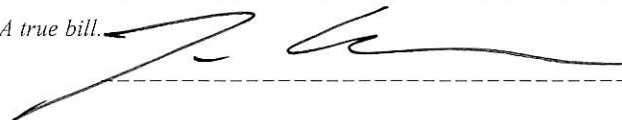
TEHUTI AYEBOAFO,

Defendant.

INDICTMENT

(T. 18, U.S.C., §§ 2 and 3551 et seq.; T. 21, U.S.C., §§ 841(a)(1),
841(b)(1)(B)(iii), 841(b)(1)(C), 853(a) and 853(p))

A true bill.



Foreperson

Filed in open court this _____ day,

of _____ A.D. 20 _____

Clerk

Bail, \$ _____

Nicholas J. Moscow, Assistant U.S. Attorney (718) 254-6212